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16 Attorneys for Plaintiffs

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 OAKLAND DIVISION

20 IMMIGRANT LEGAL RESOURCE CENTER; EAST BAY SANCTUARY COVENANT; COALITION FOR HUMANE IMMIGRANT RIGHTS; CATHOLIC LEGAL IMMIGRATION NETWORK, INC.; INTERNATIONAL RESCUE COMMITTEE; ONEAMERICA; ASIAN COUNSELING AND REFERRAL SERVICE; ILLINOIS COALITION FOR IMMIGRANT AND REFUGEE RIGHTS,

21 Plaintiffs,

22 v.

23 CHAD F. WOLF, *under the title of Acting Secretary of Homeland Security*; U.S. DEPARTMENT OF HOMELAND SECURITY; KENNETH T. CUCCINELLI, *under the title of Senior Official Performing the Duties of the Deputy Secretary of Homeland Security*; U.S. CITIZENSHIP & IMMIGRATION SERVICES

24 Defendants.

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Case No. 4:20-cv-05883-JSW

DECLARATION OF JESSE BLESS IN SUPPORT OF PLAINTIFFS' MOTION FOR SUPPLEMENTAL BRIEFING

Assigned to Hon. Jeffrey S. White

Date: September 25, 2020
Time: 9:00 a.m.
Courtroom: 5, 2nd Floor

JURY TRIAL DEMANDED

DECLARATION OF JESSE BLESS

I, Jesse Bless, declare as follows:

1. I am an attorney licensed to practice law in all the courts of the State of Massachusetts, and have been admitted *pro hac vice* in this case. I am the Director of Federal Litigation for the American Immigrant Lawyers Association, counsel of record for Plaintiffs Immigrant Legal Resource Center (“ILRC”), East Bay Sanctuary Covenant (“EBSC”), Coalition for Humane Immigrant Rights (“CHIRLA”), Catholic Legal Immigration Network, Inc. (“CLINIC”), International Rescue Committee (“IRC”), OneAmerica, Asian Counseling and Referral Service (“ACRS”), and Illinois Coalition for Immigrant and Refugee Rights (“ICIRR”) in this case (collectively “Plaintiffs”). This declaration is submitted in support of Plaintiffs’ Civ. L.R. 7-11 Request for Supplemental Briefing. The facts set forth in this declaration are within my personal knowledge. If called as a witness, I could and would competently testify as follows.

2. On September 16, 2020, co-counsel and I contacted Defendants' counsel for their position on Plaintiffs' request for supplemental briefing, pursuant to Civ. L.R. 7-11.

3. On September 16, 2020, Defendants' counsel stated they would not oppose Plaintiffs' motion and the documents submitted therewith, provided they receive the opportunity to also provide supplemental briefing setting forth Defendants' views as to the supplemental documentation.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on this 16th day of September, 2020, at Boston, Massachusetts.

/s/ Jesse Bless

Jesse Bless

ATTESTATION

Pursuant to Local Civil Rule 5-1(i)(3), I hereby attest that all signatories listed above, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

Dated: September 16, 2020

/s/ Brian J. Stretch
Brian J. Stretch